

# **EXHIBIT 17**

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;  
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
PLAINTIFF AHMED; PLAINTIFF RACHEL;  
PLAINTIFF ALI; HIAS, INC.; CHURCH  
WORLD SERVICE, INC.; and LUTHERAN  
COMMUNITY SERVICES NORTHWEST,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; MARCO RUBIO,  
in his official capacity as Secretary of State;  
KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security; DOROTHY A.  
FINK, in her official capacity as Acting Secretary  
of Health and Human Services,

*Defendants.*

Case No. C25-255 JNW

**DECLARATION OF PLAINTIFF  
SARA**

DECLARATION OF PLAINTIFF SARA – 1  
(No. C25-255 JNW)

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### **DECLARATION OF SARA**

I, Sara, declare as follows:

1. I am 59 years old, and I am of sound mind.
2. I am waiting to travel to the United States as a refugee together with my son who is 18 years old.
3. I applied to the U.S. Refugee Admissions Program in 2014, and I was about to travel to the United States when President Trump suspended refugee admissions.
4. I live in Amman, Jordan.
5. I am a citizen of Iraq.
6. My older son lives in Idaho. He came to the United States as a refugee in approximately 2012, and he is now a U.S. citizen. He is married, and his wife is pregnant with their first child.
7. I was forced to leave Iraq because I was in extreme danger there. I lived with my family in Basra during the U.S.-Iraq war. When the shelling got very bad, my husband brought me and my older son to stay with my parents where we thought it was safer. My husband's car was bombed after he dropped us off, and my husband was killed.
8. After my husband's death, my husband's brother demanded that I give him my house and custody of my baby son. My brother-in-law is a member of an influential militia network, and he threatened me and shot a gun at my home. The police told me they could not help me, and ultimately my brother-in-law took my house and I fled to Jordan with my son.
9. After the move to Jordan, I gave birth to my second son, who suffers from a birth defect in his brain that affects his nerves and vision.

10. I applied for refugee status for myself and my younger son in 2014, and we went through many processing steps, including interviews.
11. Finally, in January 2024, my younger son and I were conditionally approved for refugee resettlement.
12. We completed multiple rounds of medical exams because our first medical exams expired before we could travel.
13. Around January 13, 2025, I began my cultural orientation. I found this be very useful because it explained a lot about our travel to the United States and it gave me insight into the school systems in the country for those older than 18 years old. It made me think about my goals for myself and my youngest son. I thought that maybe I could go to school and get a driver's license. I asked the staff during my cultural orientation if I could achieve this and they told me, "you can do anything as long as you follow the rules."
14. IOM told me that once we were scheduled for travel, that the process would happen quickly. To prepare myself, I purchased two pieces of luggage and sold some items for our travel to the United States. I wanted to make sure to be ready for the day that I received the call from the U.S. government that we would travel to the United States.
15. In the days before I found out about the refugee suspension, my son in the United States called me multiple times a day to ask about cultural orientation and what I had learned. I could tell that he was excited for me to be learning about American culture and his excitement made me so happy.
16. My son told me that he had already prepared a room for us in his home, and that he would look for a bigger house so that we could all have our own rooms. I told him that I didn't need anything else because I was just so happy that we would be together soon.

17. On January 25, 2025, IOM called me and told me that the refugee program was suspended because the President had paused refugee admissions for at least 90 days.
18. I could not believe the news. I had been waiting for so long and I thought the wait was finally over and we would be able to come to safety and reunite with my son and his family.
19. Conditions in Jordan are difficult. We face discrimination and extortion as refugees. In or around July of 2023, my son was beaten and robbed by a gang in our neighborhood. I live in fear.
20. Whenever I close my eyes, I imagine myself at the airport and I see my oldest son waiting for me. My son told me that he would be waiting for me at the airport.
21. It is extremely difficult to be apart from my older son. I talk to him daily. He is married now, and I was looking forward to meeting his wife. She is pregnant, and I hoped to be in the United States in time for my first grandchild's birth. I was hoping to be there to support him and his wife. My son told me that I did not need to buy anything for them, but I still bought my grandchild some clothes. I hope to be able to gift the clothes while the baby is still young enough to wear them.
22. I fear that if my real name becomes public in this lawsuit, my brother-in-law and the militia he is affiliated with may target my mother and my siblings who are still living in Iraq in retaliation for me speaking publicly about my brother-in-law's crimes.
23. I also fear that if my real name becomes public in this lawsuit, my pending refugee application could be jeopardized. My application remains pending and is in final stages of processing, and I do not want my participation in the lawsuit to adversely impact my application and delay or prevent me and my son from coming to the United States.

24. For these reasons, I believe that my personal security and that of my family necessitates that I be allowed to use a pseudonym in this case.
25. I am willing to serve as a class representative on behalf of those who are similarly situated to me and my family who are trying to come to the United States through the refugee program.
26. I know that if the class is certified, I will be representing more than just myself in this case. I will be representing the interests of other refugee applicants and their family members. I understand what being a class representative means.
27. I want to help everyone in my and my family's situation because I know that there are many other refugees prevented from traveling who are suffering through things that are even more difficult than my situation. For instance, there are many refugees who I have met in Jordan with serious health issues or who are caring for disabled family members, and they need medical treatment and to be reunited with family in the United States. I am willing to be actively involved in this lawsuit as a class representative and to work with my attorneys to help all of the class members.
28. This declaration has been read to me aloud in Arabic, a language I understand, and I have understood it and verified its contents.

*I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.*

*Executed in Amman, Jordan on February 9, 2024*

**REDACTED**